

EXHIBIT B

From: Silverstein, Michael <MSilverstein@beneschlaw.com>
Sent: Wednesday, January 29, 2025 1:58 PM
To: jsimes@goodwinprocter.com; Spillane, Meghan K <MSpillane@goodwinlaw.com>
Cc: Connolly, J. Erik <econnolly@beneschlaw.com>; Kovacs, Caitlin <CKovacs@beneschlaw.com>
Subject: Heilbut, et al. v. Cassava Sciences, Inc., et al., No. 1:24-cv-05948 (S.D.N.Y.) - CONFIDENTIAL Agreement to Engage in Confidential Settlement Negotiations

Counsel,

As we previously indicated, our clients are open to resolving the above-captioned matter without judicial intervention. However, before beginning any settlement discussions, we would like to ensure that such discussions would be kept confidential and not disclosed to any third parties.

Accordingly, attached please find correspondence from Caitlin Kovacs that contains an Agreement to Engage in Confidential Settlement Negotiations. If you agree, please return a signed copy of this letter by Monday, February 3, 2025.

Thank you,
Michael

 Benesch



[vCard](#) [Bio](#)

Michael B. Silverstein
(he/him/his)
Managing Associate | Litigation
Benesch Friedlander Coplan & Aronoff LLP

t: [614.223.9362](tel:614.223.9362) | m: [215.837.2076](tel:215.837.2076)

MSilverstein@beneschlaw.com | www.beneschlaw.com

41 South High Street, Suite 2600, Columbus, OH 43215-6164

[Confidentiality Notice to Incorrect Addressee: www.beneschlaw.com/confidentialitynotice](http://www.beneschlaw.com/confidentialitynotice)



Caitlin Alejandrina Kovacs
71 South Wacker Drive, Suite 1600
Chicago, Illinois 60606-4637
Direct Dial: 312.624.6392
Fax: 312.767.9192
ckovacs@beneschlaw.com

January 29, 2025

VIA EMAIL
CONFIDENTIAL

Jeffrey A. Simes
Meghan K. Spillane
Goodwin Procter LLP
620 Eighth Avenue
New York, NY 10018

Re: *Heilbut, et al. v. Cassava Sciences, Inc., et al.*, No. 1:24-cv-05948 (S.D.N.Y.)
Agreement to Engage in Confidential Settlement Negotiations

Counsel:

This letter contains a confidentiality agreement for our respective clients to engage in confidential negotiations to settle the above-captioned matter. By signing below, our clients can assure themselves that they can engage in a productive and candid process to resolve their disputes without fear of disclosure to any third party. Therefore, please review and sign this letter, returning it to my attention no later than Monday, February 3, 2025.

The above-referenced matter has been filed by Adrian Heilbut, Jesse Brodtkin, and Enea Milioris ("Plaintiffs") and Dr. David Bredt and Dr. Geoffrey Pitt ("Intervenor Plaintiffs") against Cassava Sciences, Inc., Remi Barbier, and Dr. Lindsay Burns ("Defendants").

Intervenor Plaintiffs and Defendants wish to meet, confer, and attempt to compromise and otherwise resolve the above-captioned case ("Settlement Negotiations").

Intervenor Plaintiffs and Defendants agree and acknowledge that the Settlement Negotiations shall be confidential, privileged, and inadmissible for any purpose pursuant to Federal Rule of Evidence 408.

Intervenor Plaintiffs and Defendants agree that they shall not disclose the substance of or existence of the Settlement Negotiations to any third party, including Plaintiffs.

This agreement incorporates all statutory provisions and court rules for non-disclosure and confidentiality of verbal and written statements made in settlement negotiations.

Jeffrey A. Simes
Meghan K. Spillane
January 29, 2025
Page 2

Please indicate your agreement with the terms of this confidentiality agreement by signing below.

Sincerely,

BENESCH, FRIEDLANDER,
COPLAN & ARONOFF LLP

/s/ Caitlin Alejandrina Kovacs

Caitlin Alejandrina Kovacs

Agreed to this ____ day of _____,
2025

Agreed to this ____ day of _____,
2025

Print name:

*Counsel for and authorized representative
of Dr. David Bredt and Dr. Geoffrey Pitt*

Print name:

*Counsel for and authorized representative
of Cassava Sciences, Inc., Remi Barbier,
and Dr. Lindsay Burns*